

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GEORGE PACKARD, EDWARD BECK,
MICHELLE BERGER, ARI COWAN, CONNOR
HICKS, CHARLES MEACHAM, CHRIS
PHILLIPS, LARRY SWETMAN, and AMADON
DELERBA, *individually and on behalf of all others
similarly situated,*

Plaintiffs,

-against-

THE CITY OF NEW YORK, a municipal entity,
FORMER NYPD CHIEF OF PATROL JOSEPH
ESPOSITO, FORMER NYPD COMMISSIONER
RAY KELLY, FORMER MAYOR MICHAEL
BLOOMBERG, NYPD CHIEF THOMAS P.
PURTELL, NYPD DEPUTY CHIEF STEVEN
ANGER, and NYPD DEPUTY CHIEF JAMES
MCNAMARA,

Defendants.

Index No. 15-cv-7130(AT)(RLE)

DISCOVERY PLAN

This Discovery Plan is submitted by the parties in accordance with Fed. R. Civ. P.
26(f)(3).

DISCOVERY PLAN

I. SUBJECTS ON WHICH THIS DISCOVERY PLAN RELATES

1. This Discovery Plan shall relate to the above captioned-litigation and follow the
scope and limits on discovery as set forth in Fed. R. Civ. P. 26(b).

II. TIMING OF DISCOVERY

1. Initial disclosures, pursuant to Fed. R. Civ. P. 26(a)(1) shall be completed within
30 days from the date of the submission of this Discovery Plan.

2. All fact discovery shall be completed no later than December 20, 2017. This date
shall not be modified without application to the Court.

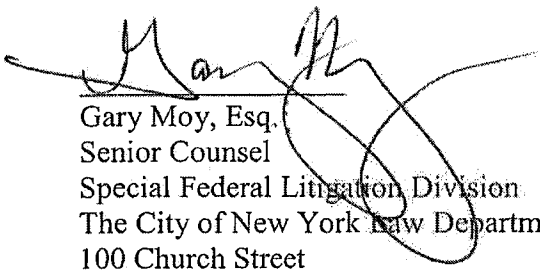
3. Timing of Expert Discovery

- a. Within 45 days of the conclusion of fact discovery, as set forth in paragraph II.2 above, Plaintiffs shall provide any expert report(s) intended for use in this action to Defendant. Within 45 days of the provision of Plaintiffs' expert report(s), Defendant shall conduct all expert discovery relating to Plaintiffs' expert report(s), if any.
- b. Within 45 days of the conclusion of discovery relating to Plaintiffs' expert(s), Defendant shall provide any expert report(s) intended for use in this action to Plaintiffs. Within 45 days of the provision of Defendant's expert report(s), Plaintiffs will conduct all expert discovery relating to Defendant's expert report(s), if any.
- c. Plaintiffs shall file a rebuttal report, if any, within 21 days of the conclusion of expert discovery of Defendant's expert report.

Privilege Procedures

The parties will prepare privilege logs pursuant to Fed. R. Civ. P. 26(b)(5)(a).

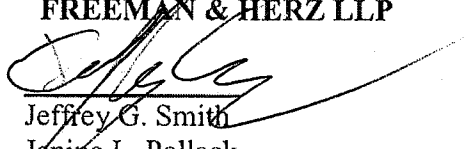
Dated: March 16, 2017



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